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14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

17 IN RE: UBER TECHNOLOGIES, INC.,
 18 PASSENGER SEXUAL ASSAULT
 19 LITIGATION

20 Case No. 3:23-md-03084-CRB

21 **DECLARATION OF STEVEN S.
 22 SCHULTE IN SUPPORT OF
 23 NACHAWATI LAW GROUP
 24 PLAINTIFFS' OPPOSITION TO
 25 DEFENDANTS UBER TECHNOLOGIES,
 26 INC., RASIER, LLC, AND RASIER-CA,
 27 LLC'S MOTION TO DISMISS CASES
 28 FOR FAILURE TO COMPLY WITH PTO
 29 31 AND SHOW-CAUSE ORDERS**

30 This Document Relates to:

31 *Jane Doe T.W. v. Uber Technologies, Inc., et al.,*
 32 *No. 3:24-cv-00559-CRB*

33 Judge: Honorable Charles R. Breyer

34 Date: January 16, 2026

35 Time: 10:00 a.m.

36 Courtroom: 6 – 17th Floor

37 *Jane Doe (L.R.) v. Uber Technologies, Inc., et*
 38 *al., No. 3:24-cv-04306-CRB*

39 *Jane Doe (A.R.) v. Uber Technologies, Inc., et*
 40 *al., No. 3:24-cv-04313-CRB*

41 *Jane Doe (D.H.) v. Uber Technologies, Inc., et*
 42 *al., No. 3:24-cv-04322-CRB*

43 *Jane Doe (K.H.) v. Uber Technologies, Inc., et*
 44 *al., No. 3:24-cv-04326-CRB*

1 *Jane Doe (Y.E.) v. Uber Technologies, Inc., et*
2 *al., No. 3:24-cv-04330-CRB*

3 *Jane Doe (S.G.) v. Uber Technologies, Inc., et*
4 *al., No. 3:24-cv-04353-CRB*

5 *Jane Doe (K.C.) v. Uber Technologies, Inc., et*
6 *al., No. 3:24-cv-04354-CRB*

7 *Jane Doe (T.W.) v. Uber Technologies, Inc., et*
8 *al., No. 3:24-cv-04356-CRB*

9 *Jane Doe (S.W.) v. Uber Technologies, Inc., et*
10 *al., No. 3:24-cv-04360-CRB*

11 *Jane Doe (S.W.) v. Uber Technologies, Inc., et*
12 *al., No. 3:24-cv-04364-CRB*

13 *Jane Doe (E.N.) v. Uber Technologies, Inc., et*
14 *al., No. 3:24-cv-04370-CRB*

15 *Jane Doe E.B. v. Uber Technologies, Inc., et al.,*
16 *No. 3:24-cv-05110-CRB*

17 *Jane Doe L.B. v. Uber Technologies, Inc., et al.,*
18 *No. 3:24-cv-05115-CRB*

19 *Jane Doe A.E. v. Uber Technologies, Inc., et al.,*
20 *No. 3:24-cv-05121-CRB*

21 *Jane Doe D.G. v. Uber Technologies, Inc., et al.,*
22 *No. 3:24-cv-05169-CRB*

23 *Jane Doe C.H. v. Uber Technologies, Inc., et al.,*
24 *No. 3:24-cv-05340-CRB*

25 *Jane Doe J.J. v. Uber Technologies, Inc., et al.,*
26 *No. 3:24-cv-05343-CRB*

27 *Jane Doe S.K. v. Uber Technologies, Inc., et al.,*
28 *No. 3:24-cv-05710-CRB*

29 *Jane Doe (C.M.) v. Uber Technologies, Inc., et*
30 *al., No. 3:24-cv-05718-CRB*

31 *Jane Doe T.M. v. Uber Technologies, Inc., et al.,*
32 *No. 3:24-cv-05764-CRB*

Jane Doe K.M. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05796-CRB

Jane Doe E.P. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05946-CRB

Jane Doe A.R. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05947-CRB

John Doe (C.S.) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05964-CRB

Jane Doe E.W. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-06073-CRB

Jane Doe S.S. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-06076-CRB

NLG (A.B.) v. Uber Technologies, Inc., et al., No. 3:25-cv-01711-CRB

NLG (M.G.) v. Uber Technologies, Inc., et al., No. 3:25-cv-01714-CRB

NLG (M.L.P.) v. Uber Technologies, Inc., et al.,
No. 3:25-cv-01717-CRB

NLG (ZD) v. Uber Technologies, Inc., et al., No. 3:25-cv-01729-CRB

Jane Doe NLG (KS) v. Uber Technologies, Inc., et al., No. 3:25-cv-02616-CRB

Jane Doe NLG (KM) v. Uber Technologies, Inc., et al., No. 3:25-cv-02706-CRB

NLG (BC) v. Uber Technologies, Inc., et al., No. 3:25-cv-02899-CRB

NLG (JH) v. Uber Technologies, Inc., et al., No. 3:25-cv-02949-CRB

Jane Doe NLG (KM) v. Uber Technologies, Inc., et al., No. 3:25-cv-02956-CRB

Jane Doe NLG (SB) v. Uber Technologies, Inc., et al., No. 3:25-cv-02973-CRB

NLG (MH) v. Uber Technologies, Inc., et al., No. 3:25-cv-05163-CRB

NLG (R.G.) v. Uber Technologies, Inc., et al., No. 3:25-cv-05776-CRB

NLG (LL) v. Uber Technologies, Inc., et al., No. 3:25-cv-05865-CRB

NLG (NM) v. Uber Technologies, Inc., et al., No. 3:25-cv-05867-CRB

NLG (KF) v. Uber Technologies, Inc., et al., No. 3:25-cv-06031-CRB

Jane Doe CH v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04363-CRB

Jane Doe NLG JV v. Uber Technologies, Inc., et al. No. 3:24-cv-08622-CRB

Jane Doe NLG BH v. Uber Technologies, Inc., et al. No. 3:25-cv-00369-CRB

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for the plaintiffs represented by Nachawati Law Group whose claims are the subject of Defendants' Motion to Dismiss. ECF No. 4456.
2. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with PTO 31 and Show-Cause Orders. ECF No. 4456.
4. Despite significant efforts, including numerous phone calls, emails, texts, written letters, and address searches, our office has been unsuccessful in connecting with certain Plaintiffs as to the verified statement of explanation that is the subject of Defendants' Motion.
5. Plaintiffs Jane Doe LR, Jane Doe NLG (RG), Jane Doe NLG (NM), Jane Doe KC have submitted and produced verified statements of explanation as required by Pretrial Order No. 31 ("PTO 31"), as of December 5, 2025. Counsel would therefore dispute their inclusion on Uber's list of delinquencies, provided in their Motion, as well as respectfully request for their exclusion on any future entry of dismissal by the Court.
6. On December 5, 2025, Plaintiff Jane Doe NLG SB produced a bona fide ride receipt and a statement verifying under penalty of perjury that it is a bona fide ride receipt relating to the Uber trip relating to the allegations contained in Plaintiff's complaint, and thus, compliance with PTO 31 has been satisfied.

Executed on December 5, 2025, in Dallas, Texas.

NACHAWATI LAW GROUP

/s/ Steven S. Schulte
Steven S. Schulte (TX SBN 24051306)